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REMARKS

Claims 1-29 are currently pending in the subject application and are presently under consideration. A version of all pending claims is found at pages 2-8. Claims 4, 10, 11, 21 and 29 have been amended herein to emphasize novel features of the claimed invention. Claims 1, 18 and 27 have been cancelled. In addition, new claims 30-39 have been added to further emphasize various novel aspects of the claimed invention. It is believed these new claims do not raise any new issues requiring search or undue effort by the Examiner. Favorable consideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Objection to Drawings Under 37 CFR §1.83(a)

The drawings are objected to under 37 CFR §1.83(a) for failing to show every feature of the invention specified in the claims. This objection should be withdrawn in light of the cancellation of claims 1, 18 and 27, and further in view of the amendment to claim 10.

II. Rejection of Claim 21 Under 35 U.S.C. §112

Claim 21 stands rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicants regard as the invention. This rejection is moot and should be withdrawn in view of the amendment to claim 21.

III. Rejection of Claims 1-3 and 23-28 Under 35 U.S.C. §103(a)

Claims 1-3 and 23-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Okita *et al.* (US 6,225,998) in view of Bacon *et al.* (US 6,430,538). It is respectfully requested that this rejection should be withdrawn for at least the following reasons. Claim 1 has been cancelled herein, and Okita *et al.* and Bacon *et al.*, neither alone nor in combination, teach or suggest all the claim limitations as set forth in independent claims 2 and 23.

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To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. See MPEP §706.02(j). The *teaching or suggestion to make the claimed combination* and the reasonable expectation of success *must be found in the prior art and not based on the Applicant's disclosure*. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

Independent claims 2 and 23 recite *receiving a data modification request*. The claimed invention relates to a computing workflow system having process definition represented in a workflow table. In particular, the invention as claimed, upon receipt of a modification to data, identifies the workflow steps based on the modification from a table of workflow steps, and thereupon invokes a workflow engine to enforce the state transitions based upon a table of workflow steps. Neither Okita *et al.* nor Bacon *et al.* alone or in combination teach or suggest this exemplary feature.

As the Examiner concedes, Okita *et al.* does not teach or suggest the limitation of receiving a modification to data associated with the process. In recognition of the omission in Okita *et al.*, the Examiner attempts to utilize Bacon *et al.* to cure the defect. However, Bacon *et al.* states that "the client includes logic to receive the participant entered data and to modify the work item as determined by the participant entered data, and logic to provide the modified work item to the server ..." (See, claim 2). Thus, Bacon *et al.* apparently receives participant entered data comprising both the modified data as well as constructs on how the data is to be modified. This is in contrast to the claimed invention that receives modification to data, whereupon, based on the modification received, workflow steps are identified and the workflow engine subsequently invoked. The workflow steps that are identified subsequent to receipt of the modified data are distinct from the modified data. It is the identified workflow steps that

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determine how the modification as received is to be handled, not the data modification itself. (*See*, pages 9-10). Thus, the invention as claimed is distinguishable from Bacon *et al.*

In view of at least the foregoing, it is respectfully submitted that the rejection of independent claims 2 and 23 (and claims 3, 24-25 and 27-28, which depend therefrom) should be withdrawn.

IV. Rejection of Claims 4-9, 11-20 and 29 Under 35 U.S.C. §103(a)

Claims 4-9, 11-20 and 29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Okita *et al.* (US 6,225,998) in view of Rosenthal *et al.* (US 6,311,192), and further in view of Hoffecker *et al.* (US 5,325,505). It is respectfully requested that this rejection should be withdrawn for at least the following reasons. Independent claims 4, 11, and 29 have been amended to more clearly point out various aspects of the claimed invention, and Okita *et al.*, Rosenthal *et al.* and Hoffecker *et al.* individually and/or in combination, do not teach or suggest all the limitations of the subject claims as amended.

In addition, none of the documents cited teach or suggest a *workflow extended store communicatively coupled to the server database ... wherein the workflow triggers analyze a data modification request to the data table and invoke the extended store* as recited in independent claim 17. Okita *et al.* teaches one or more remote computer systems capable of executing applications on a server, but as the Examiner acknowledges, does not teach or suggest a workflow extended store communicatively coupled to the server database; Rosenthal *et al.* teaches a workflow engine initiating workflows from scenario tables and scenario attribute tables, but is silent regarding a workflow extended store wherein analysis of data modification requests by workflow triggers invoke the extended store; and Hoffecker *et al.* does not contemplate a workflow trigger that can invoke an extended store. Thus, in view of at least the foregoing, this rejection should be withdrawn with respect to independent claims 4, 11, 17 and 29, together with those claims that depend therefrom.

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V. Rejection of Claims 21 and 22 Under 35 U.S.C. §103(a)

Claims 21 and 22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Okita *et al.* (US 6,225,998) in view of Rosenthal *et al.* (US 6,311,192), further in view of Hoffecker *et al.* (US 5,325,505) and further in view of Flores *et al.* (US 6,073,109). It is respectfully requested that this rejection should be withdrawn for at least the following reasons. Claims 21 and 22 depend from claim 17, and as discussed *supra*, Okita *et al.*, Rosenthal *et al.* and Hoffecker *et al.* do not teach or suggest all the limitations recited in independent claim 17, and Flores *et al.* is insufficient to make up for this deficiency. Withdrawal of this rejection is therefore requested.

VI. Rejection of Claim 10 Under 35 U.S.C. §103(a)

Claim 10 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Okita *et al.* (US 6,225,998) in view of Rosenthal *et al.* (US 6,311,192), further in view of Hoffecker *et al.* (US 5,325,505) and further in view of Grooters (US 6,412,031). It is respectfully requested that this rejection should be withdrawn for at least the following reasons. Claim 10 depends from independent claim 4, and for reasons stated above, neither Okita *et al.*, Rosenthal *et al.*, Hoffecker *et al.* nor Grooters cure the aforementioned deficiencies with respect to independent claim 4. Accordingly, this rejection should be withdrawn.

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CONCLUSION

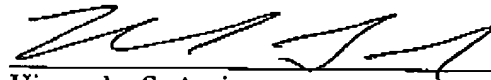
The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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